

# INEOS ABS

## INEOS ABS (USA) Corporation

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Addyston, OH 45001

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July 30, 2014

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

RE: Consent Decree Civil Action No. 1:09-CV-545  
Effective Date February 4, 2010



Dear Sirs:

Please find attached the Leak Detection and Repair Compliance Status Report for first Half 2014. Please contact me at (513) 467-2184 or [bradley.fattlar@ineos.com](mailto:bradley.fattlar@ineos.com) if you have any questions concerning the submitted information.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Bradley Fattlar".

Bradley Fattlar  
Air Quality Engineer  
INEOS ABS (USA) Corporation

cc: M. Palermo, USEPA Region 5  
B. Weinburg, OEPA  
G. Bachmann, Ohio AG  
B. Pray (M. Kramer), SWOAQA

12-1-11  
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**INEOS ABS (USA) CORPORATION'S ADDYSTON, OH PLANT**  
**CONSENT DECREE COMPLIANCE STATUS REPORT**

Consent Decree Civil Action No. 1:09-CV-545

Effective Date February 4, 2010

Reporting Period: 01/01/14 – 06/30/14

**I. INTRODUCTION**

The following report contains the required information about INEOS ABS' compliance activities associated with the requirements in Paragraph 35.a. through 35.h. in Appendix A of the Consent Decree.

**II. COMPLIANCE REQUIREMENTS**

Per Appendix A (Enhanced Leak Detection and Repair Program) of the Consent Decree, INEOS ABS met the following compliance requirements:

**A. PERSONNEL REQUIREMENTS**

1. Plant Personnel – The facility employs one full-time Leak Detection and Repair (LDAR) Monitoring Technician to perform monitoring at the facility. In addition, we have an additional four technicians that are trained and perform monitoring in addition to the (LDAR) Monitoring Technician. The LDAR Administrator is not a full time position, but the engineer assigned to this position spends approximately one-third of their time on administrating the program. In March 2013 a technician assumed the LDAR Administrator responsibilities. The LDAR monitoring technician and the new LDAR Administrator are currently Co-leading the program. LDAR repairs are assigned to the Maintenance work request database and prioritized ahead. Recent past performance has shown that the number of employees assigned to the LDAR program is sufficient. Administrative controls have been implemented so that sufficient resources will be utilized if needed to ensure compliance with this program.
2. Contractors – Contractors were not used in the first half of 2014 and are not planned to be used going forward. Contractors can be used, however, for peak work hours.

**B. NON-COMPLIANCE WITH APPENDIX A**

Per Paragraph 50 b. of the Consent Decree, INEOS ABS submitted the following letters of noncompliance to the U.S. EPA and Ohio EPA:

No letters of noncompliance with Appendix A were submitted in this period.

**C. PROBLEMS ENCOUNTERED**

No problems were encountered in complying with the requirements of Appendix A.

**D. COMMERCIAL UNAVAILABILITY OF CERTIFIED LOW-LEAKING VALVES/ PACKING TECHNOLOGY**

Only certified low-leaking valves and certified low-leaking packing technology has been used during repairs/replacements of valves and/or packing materials.

**E. EQUIPMENT REPLACEMENT/IMPROVEMENT PROGRAM (ERIP)**

Attachment #1 includes additional information on the ERIP, including each piece of equipment replaced or improved and the schedule for future replacements or upgrades. The information provided is for the first half of 2014.

F. LDAR TRAINING

Initial General training was completed for all employees at the facility in November 2011. Annual refresher training for 2014 will be completed in August. Any contractors that would be performing LDAR activities are trained on LDAR requirements at the facility and are provided with a copy of Appendix A.

G. QUALITY ASSURANCE/QUALITY CONTROL (QA/QC) AUDITS

QA/QC audits were performed each quarter in 2014 and the following corrective actions were identified and addressed:

1. First Quarter 2014

No corrective action plans were identified.

2. Second Quarter 2014

No corrective action plans were identified.

H. LDAR EXTERNAL AUDIT

The LDAR External Audit was not required in the first half of 2014. The LDAR External Audit for 2014 will be completed by the end of September 2014.

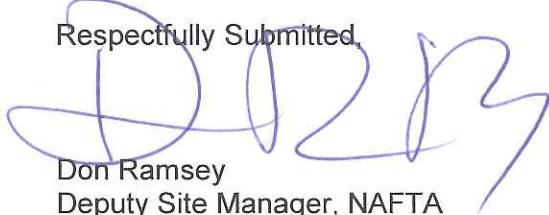
I. CORRECTIVE ACTION PLAN (CAP)

The FINAL Corrective Action Plan was submitted for approval on January 28, 2014. Production could not inspect all of the points by the end of May. The Environmental Audit was conducted by the end of June. The inspection and audit process is still underway.

## II. CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

Respectfully Submitted,



Don Ramsey  
Deputy Site Manager, NAFTA  
INEOS ABS (USA) Corporation

CC: Eric Cassisa

**INEOS ABS (USA) CORPORATION'S ADDYSTON, OH PLANT**  
**CONSENT DECREE SEMIANNUAL REPORT**

**ATTACHMENT # 1**

**Equipment Replacement/Improvement Program**

Consent Decree Civil Action No. 1:09-CV-545

Effective Date February 4, 2010

Reporting Period: 01/01/14 – 6/30/14

## INEOS ABS - Addyston Plant

### LDAR Leakers - 2014

Tag #	Process Unit	Component Description	Leak Detected	First Attempt Required By	First Attempt Completed	Maintenance Performed	Re-scanned Completed	Final Repair Required By	Final Repair Completed	Maintenance Performed	Comments/ Reason for Delay of Repair
03847	DN3	STY TO RECYCLE COND FM MAN INLET BLK VLV	01/15/14	01/20/14	01/16/14	Tightened Packing	01/16/14	01/30/14	01/16/14	NA	Visusal Fail
11155	DN3	SPRAY TO RECYCLE CONDENSER	01/15/14	01/20/14	01/16/14	Tightened Packing	01/16/14	01/30/14	01/16/14	NA	Visusal Fail
03503*	CN1	AUTO BLOCK VALVE OFF OF 2ND AN FILTER TO SAN	01/29/14	02/03/14	01/31/14	Tightened Packing	01/31/14	02/13/14	01/31/14	NA	
11087*	DIN2	LINE TO BARO SUMP MAN DRAIN VLV- LEVEL BELOW JETS	03/11/14	03/16/14	03/12/14	Tightened Bonnet	03/12/14	03/26/14	03/12/14	NA	
11087*	DIN2	LINE TO BARO SUMP MAN DRAIN VLV- LEVEL BELOW JETS	03/19/14	03/24/14	03/21/14	Tightened Bonnet	03/21/14	04/03/14	03/21/14	NA	
08567*	DIN1	N UP STAIRS FROM CAT AREA, 3 FT N OF DIN-1, R-1 E LADDER, 8 FT HI	03/14/14	03/19/14	03/18/14	Tightened Bonnet	03/18/14	03/29/14	03/18/14	NA	
01940*	DIN2	RECYCLE IN R2 FEED TREE-FM MAN DRAIN VLV-OUTLET SIDE	03/18/14	03/23/14	03/19/14	Replaced Gasket	03/19/14	04/02/14	03/19/14	NA	
11035	DN3	N2 TESTING MANUAL VALVE	04/23/14	04/28/14	04/28/14	Replaced Valve	04/28/14	05/08/14	04/28/14	NA	
01401*	DIN1	AN TOTALZER INLET VLV FOR DIN1	05/30/14	06/04/14	06/02/14	Tightened Bonnet	06/02/14	06/14/14	06/02/14	NA	
01400*	DIN1	AN TOTALZER VLV BYPASS	05/31/14	06/05/14	06/02/14	Tightened Bonnet	06/02/14	06/15/14	06/02/14	NA	

\*- Previously Equiped with Certified Low Leaking Valves





**INEOS ABS - Addyston Plant**  
**LDAR ERIIP Outstanding Improvement**

1/28/2013

Tag #	Process Unit	Component Description	Leak Detected	Replace/ Repack By Date
11249	DN3	MEK TANK-MAN VLV FOR NITROGEN AT TOP OF THE TANK	04/23/14	Next Maintenance Turn Around
07099	DIN1	Refrigeration recycle tank	10/29/13	Next Maintenance Turn Around



# INEOS ABS - Addyston Plant

## LDAR ERIP Outstanding Improvement

1/28/2014

Tag #	Process Unit	Component Description	Leak Detected	Date Replaced or Repacked
08285	DN3	TOP OF MEK TANK-MAN BLK VLV IN METERING PUMPS RECIRC LINE	04/23/14	07/09/14
08290	DN3	TOP OF MEK TANK-TRUCK FILL LINE MAN VLV	04/23/14	07/09/14
11035	DN3	N2 TESTING MANUAL VALVE	04/23/14	04/28/14
11087	DIN2	LINE TO BARO SUMP MAN DRAIN VLV-LEVEL BELOW JETS	03/12/14	07/09/14
02068	DIN2	Recycle FCV	10/27/13	07/02/14
01963	DIN2	Irganox in R2 feed tree	10/23/13	07/08/14
00524	DN1	DN3 purge into spent monomer tank	11/22/13	11/22/13
03816	DN1	Recycle to top of DV1 FM man outlet valve	11/27/13	03/28/14



**INEOS ABS - Addyston Plant**  
**LDAR Leaker Replacements/Repackings -**  
**Greater than 250 ppm Leak**

1/28/2014

Tag #	Process Unit	Component Description	Leak Detected	Date Replaced	Date Repacked	Shutdown Req'd?	Replace/ Repack By Date	Comments
11035	DN3	N2 TESTING MANUAL VALVE	04/23/14	04/28/14		Replaced Valve		



**INEOS ABS - Addyston Plant**  
**LDAR Leaker Replacements/Repackings -**  
**Between 100 ppm and 250 ppm Leak**  
**April 1, 2014 - June 30, 2014**

Tag #	Process Unit	Component Description	Leak Detected	Conc. (ppm)	Date Replaced	Date Repacked
08290	DN3	TOP OF MEK TANK-TRUCK FILL LINE MAN VLV	04/23/14	155	07/09/14	
11249	DN3	MEK TANK-MAN VLV FOR NITROGEN AT TOP OF THE TANK	04/23/14	153		
08285	DN3	TOP OF MEK TANK-MAN BLK VLV IN METERING PUMPS RECIRC LINE	04/23/14	110	07/09/14	





**INEOS ABS - Addyston Plant**  
**LDAR Leaker Replacements/Repackings -**  
**Between 100 ppm and 250 ppm Leak**  
**Jan 1, 2014 - March 31, 2014**

Tag #	Process Unit	Component Description	Leak Detected	Conc. (ppm)	Date Replaced	Date Repacked
11087	DIN2	LINE TO BARO SUMP MAN DRAIN VLV-LEVEL BELOW JETS	03/12/14	156	07/09/14	
02096*	DIN2	AN TO PROCESS-2ND FLR-WEST OF CONTACTOR	03/09/14	152		

\* - Previously Equiped with Certified Low Leaking Technology



**INEOS ABS - Addyston Plant**  
**LDAR Leaker Replacements/Repackings -**  
**Between 100 ppm and 250 ppm Leak**  
**October 1, 2013 - December 31, 2013**

Tag #	Process Unit	Component Description	Leak Detected	Conc. (ppm)	Date Replaced	Date Repacked
07099	DIN1	Refigeration recycle tank	10/29/13	142		
01400*	DIN1	AN filter system	10/04/13	130		
02068	DIN2	Recycle FCV	10/27/13	211	07/02/14	
01963	DIN2	Irganox in R2 feed tree	10/23/13	120	07/08/14	
00524	DN1	DN3 pruge into spent monomer tank	11/22/13	184	11/22/13	
03816	DN1	Recycle to top of DV1 FM man outlet valve	11/27/13	104	03/28/14	

\* - Previously Equiped with Certified Low Leaking Technology

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